

1 RICHARD A. SCHONFELD, ESQ.  
2 Nevada Bar No. 6815  
3 CHESNOFF & SCHONFELD  
4 520 South Fourth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702)384-5563  
7 Attorney for Defendant, *JASON ERIC JOHNSON*

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\*\*\*\*

UNITED STATES OF AMERICA )  
Plaintiff, )  
v. ) 2:13-cr-00395-GMN-GWF  
JASON ERIC JOHNSON )  
RICKY RICARDO PLAZOLA )  
Defendant. )

**STIPULATION TO CONTINUE PRETRIAL MOTION DEADLINES AND**  
**[PROPOSED ORDER]**  
(Fourth Request/Second Request Since Superseding Indictment)

IT IS HEREBY STIPULATED and AGREED by and between Robert Knief, Assistant United States Attorney, Richard A. Schonfeld, Esq., attorney for Defendant Jason Eric Johnson and John Spilotro, Esq., attorney for Defendant Ricky Ricardo Plazola that the parties shall have to and including February 2, 2015, within which to file Defendants' additional pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties herein, that they shall have to and including February 16, 2015, within which to file any and all responsive pleadings.

1       **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties herein that  
2 they shall have to and including, February 23, 2015, within which to file any and all replies to said  
3 motions.  
4

5           This Stipulation is entered into for the following reasons:

6       1.       That Counsel for the Government filed a Superseding Indictment against the  
7 Defendants on October 28, 2014, and as a result therefrom Defendants need additional time to  
8 adequately research, prepare, and submit for filing appropriate motions and responses, taking into  
9 account the exercise of due diligence;

10       2.       That Counsel for Defendants are still awaiting additional discovery from the  
11 government related to the new charges;

12       3.       That the Government has no objection to the continuance;

13       4.       Denial of this request for continuance of the pretrial motions deadlines, response  
14 deadlines and trial date would deny counsel for both the government and Defendant sufficient time  
15 within which to be able to adequately research, prepare, and submit for filing appropriate motions  
16 and responses, taking into account the exercise of due diligence;

17       5.       Additionally, denial of this request for continuance would result in a miscarriage of  
18 justice;

19       6.       For all the above-stated reasons, the ends of justice would best be served by a  
20 continuance for the parties' pretrial motions and response deadlines;

21       //  
22  
23  
24  
25  
26  
27  
28

1       7.     This is the fourth request to continue the pretrial motions on behalf of the  
2 parties, but the second since the Superseding Indictment.  
3

4       8.     This stipulation will not affect the current trial date.  
5

6     **DATED** this 29<sup>th</sup> day of December, 2014.  
7

8     **UNITED STATES ATTORNEY**  
9

10     **CHESNOFF & SCHONFELD**  
11

12     \_\_\_\_\_  
13     /s/  
14     **ROBERT KNIEF, AUSA**  
15     333 Las Vegas Blvd. S.  
16     Las Vegas, Nevada 89101  
17     Attorney for Plaintiff  
18

19     \_\_\_\_\_  
20     /s/  
21     **RICHARD A. SCHONFELD, ESQ.**  
22     Nevada Bar No. 6815  
23     520 South Fourth Street  
24     Las Vegas, Nevada 891001  
25     Tel: (702) 384-5563  
26     Attorney for Defendant, Jason Eric Johnson  
27

28     **SPILOTRO & KULLA**  
29

30     \_\_\_\_\_  
31     /s/  
32     **JOHN SPILOTRO, ESQ.**  
33     626 South Third Street  
34     Las Vegas, Nevada 89101  
35     Tel: (702) 385-4994  
36     Attorney for Defendant, Ricky Ricardo Plazola  
37

## **FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

Based upon the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. That Counsel for the Government filed a Superseding Indictment against the Defendants on October 28, 2014, and as a result therefrom Defendants need additional time to adequately research, prepare, and submit for filing appropriate motions and responses, taking into account the exercise of due diligence;
2. That Counsel for Defendants are still awaiting additional discovery from the government related to the new charges;
3. That the Government has no objection to the continuance;
4. Denial of this request for continuance of the pretrial motions deadlines, response deadlines and trial date would deny counsel for both the government and Defendant sufficient time within which to be able to adequately research, prepare, and submit for filing appropriate motions and responses, taking into account the exercise of due diligence;
5. Additionally, denial of this request for continuance would result in a miscarriage of justice;
6. For all the above-stated reasons, the ends of justice would best be served by a continuance for the parties' pretrial motions and response deadlines;
7. This is the fourth request to continue the pretrial motions on behalf of the parties, but the second since the Superseding Indictment.
8. This stipulation will not affect the current trial date.

## **ORDER**

**IT IS HEREBY ORDERED** that the parties herein shall be have to and including February 2, 2015, to file any and all pre-trial motions.

**IT IS FURTHER ORDERED** that the parties herein shall have to and including February 16, 2015, within which to file any and all responsive pleadings.

**IT IS FURTHER ORDERED** that the parties herein shall have to and including February 23, 2015, within which to file any and all replies.

IT IS SO ORDERED.

**DATED** this 2nd day of January, 2015

THE HONORABLE GLORIA M. NAVARRO  
UNITED STATES DISTRICT JUDGE

Submitted by:

/s/

**RICHARD A. SCHONFELD, ESQ.**  
Attorney for Jason Eric Johnson